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Attorneys for Defendants
THE BAEZ ENTITIES

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

* * *

NML CAPITAL LTD.,

Plaintiff,

vs.

THE REPUBLIC OF ARGENTINA,

Defendants.

CASE NO. 2:14-cv-00492-JAD-VCF

**DECLARATION OF LETICIA
MONTTOYA FOR USE IN SUPPORT
OF THE 123 ENTITIES' BRIEF
REGARDING THE POWER OF THE
COURT TO COMPEL
DEPOSITIONS OF NONPARTY
ENTITIES' REPRESENTATIVES
PURSUANT TO THE FEDERAL
RULES OF CIVIL PROCEDURE**

**DECLARATION OF LETICIA MONTTOYA FOR USE IN SUPPORT OF THE 123
ENTITIES' BRIEF REGARDING THE POWER OF THE COURT TO COMPEL
DEPOSITIONS OF NONPARTY ENTITIES' REPRESENTATIVES PURSUANT TO THE
FEDERAL RULES OF CIVIL PROCEDURE**

I, LETICIA MONTTOYA, hereby declare as follows:

1. I am over the age of eighteen years old, of sound mind and have never been

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1 convicted of a felony or any crime involving moral turpitude.

2 2. I have personal knowledge of all events set forth herein, unless stated upon
3 information and belief, as to those statements, I believe them to be true.

4 3. I am an appointed officer of Aldyne, Ltd. ("Aldyne").

5 4. The 123 Entities were duly organized in the State of Nevada with Aldyne initially
6 providing nominee managers services for every one of The 123 Entities upon organization.

7 5. On September 3, 2013, and in response to the subpoenas, Kent P. Woods, Esq.,
8 counsel for MF Nevada sent correspondence to NML's local counsel breaking The 123 Entities
9 into four separate and distinct categories: (a) companies which MF Nevada no longer provided
10 services as resident agent and no responsive documents were found after a search by the entity's
11 custodian of records; (b) companies which had revoked Aldyne as manager and no responsive
12 documents were found after a search by the entity's custodian of records; (c) companies which
13 have been formally dissolved and no responsive documents were found after a search by the
14 entity's custodian of records; and (d) companies which Aldyne continues to serve as manager
15 and no responsive documents were found after a search by the entity's custodian of records.

16 6. In conjunction with Mr. Woods correspondence, I, as Aldyne's appointed officer
17 and, in some instances, custodian of records for The 123 Entities, executed affidavits for each of
18 the 123 Entities detailing which of the aforementioned categories applied to said entity and
19 providing that review of said entity's records provided no documents responsive to NML's
20 subpoena.

21 7. No authorized representative from any of The 123 Entities reside, are employed
22 or regularly conduct business within 100 miles of the jurisdiction of this Court.

23 8. I do not reside, am not employed or regularly conduct business in person within
24 100 miles of the Court's jurisdiction.

25 9. None of The 123 Entities have a "bureau office" (or any office for that matter)
26 within 100 miles of this Court or the location of the proposed deposition(s).

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1 10. None of The 123 Entities have a representative, officer, member or manager
2 located within 100 miles of this Court or the location of the proposed deposition(s).

3 Pursuant to NRS 53.045, I declare under penalty of perjury under the laws of the State of
4 Nevada that the foregoing is true and correct.

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7 LETICIA MONTOYA
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